

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

<b>SWIRLATE IP LLC,</b>		C.A. No. 22-cv-235-CFC
	Plaintiff,	<b>JURY TRIAL DEMANDED</b>
v.		<b>PATENT CASE</b>
<b>QUANTELIA, INC.,</b>	Defendant.	
<b>v. LANTRONIX, INC.,</b>	Defendant.	C.A. No. 22-cv-249-CFC

**DECLARATION OF DINA GAMEZ**

I, Dina Gamez, declare as follows:

1. I am the managing member and sole owner of Swirlate IP LLC (“Swirlate”). I have personal knowledge of the facts set forth in this Declaration. I am competent to testify as to all matters stated, and I am not under any legal disability that would in any way preclude me from testifying.

2. I understand that the Court issued an order on January 23, 2024, revised on February 15, 2024, requesting that Swirlate, Swirlate’s agents, and Swirlate’s attorneys produce documents that are at least in part subject to Swirlate’s attorney-client privilege, a community of interest, and work product. I have reviewed the orders.

3. Swirlate did not request that the Court initiate a professional responsibility investigation of Mr. Bennett. Swirlate has not made any professional responsibility complaint against Mr. Bennett.

4. Swirlate IP LLC does not waive attorney-client privilege, community of interest privilege, and work product immunity with respect to any documents requested by the Court in its

investigation. Swirlate expects its agents and attorneys to maintain the privilege and work product of Swirlate's documents.

I declare under penalty of perjury that the foregoing is true and correct and that I have signed this declaration in Boston, Massachusetts on March 13, 2024.

  
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Dina Gamez  
Managing Member, Swirlate IP LLC